

**DECISION AND FINDING OF NO SIGNIFICANT IMPACT
ENVIRONMENTAL ASSESSMENT: REDUCING MAMMAL DAMAGE
IN THE STATE OF NORTH CAROLINA**

PURPOSE AND NEED FOR ACTION

The United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Wildlife Services (WS) program has prepared an Environmental Assessment (EA) to analyze the potential impacts to the quality of the human environment from resolving damage and threats of damage associated with bobcats (*Lynx rufus*), coyotes (*Canis latrans*), gray fox (*Urocyon cinereoargenteus*), red fox (*Vulpes vulpes*), raccoons (*Procyon lotor*), Virginia opossum (*Didelphis virginiana*), striped skunks (*Mephitis mephitis*), river otters (*Lontra canadensis*), woodchucks (*Marmota monax*), American mink (*Neovison vison*), feral swine (*Sus scrofa*), feral cats (*Felis domesticus*), feral dogs (*Canis familiaris*), gray squirrels (*Sciurus carolinensis*), Eastern cottontails (*Sylvilagus floridanus*), black bears (*Ursus americanus*), and white-tailed deer (*Odocoileus virginianus*) (USDA 2015). The EA and this Decision ensure WS complies with the National Environmental Policy Act (NEPA), with the Council on Environmental Quality guidelines (see 40 CFR 1500), and with the APHIS' NEPA implementing regulations (see 7 CFR 372). WS has previously developed an EA that analyzed the need for action to manage damage associated with mammals in the State (USDA 2012). In addition, the WS program in North Carolina developed an EA to address damage associated with white-tailed deer in the State (USDA 2005). Since the new EA re-evaluated activities associated with mammals, including white-tailed deer, to address a new need for action and the associated affected environment, the outcome of this Decision for the new EA will supersede the previous EA that addressed damage management activities associated with mammals (USDA 2012) and the previous EA that addressed activities associated with white-tailed deer (USDA 2005).

The need for action identified in Section 1.2 of the new EA arises from requests for assistance that WS receives. The EA evaluates the need for action to manage damage associated with mammals, the potential issues associated with managing damage, and the environmental consequences of conducting different alternatives to meet the need for action while addressing the identified issues. WS defined the issues associated with meeting the need for action and identified preliminary alternatives through consultation with the North Carolina Wildlife Resources Commission (NCWRC). The EA analyzes three alternatives in detail to meet the need for action and to address the issues analyzed in detail. Section 1.7 of the EA identified several decisions to be made based on the scope of the EA.

AFFECTED ENVIRONMENT AND ISSUES

Mammal damage or threats of damage could occur statewide in North Carolina wherever mammal species occur. Those mammal species addressed in the EA are capable of utilizing a variety of habitats in the State. Most species of mammals addressed in the EA occur throughout the year across the State where suitable habitat exists for foraging and shelter.

Issues are concerns regarding potential effects that might occur from a proposed activity. Federal agencies must consider such issues during the NEPA decision-making process. Section 2.2 of the EA describes the issues considered and evaluated in detail by WS as part of the decision-making process. In addition to those issues analyzed in detail, several issues were identified during the development of the EA but were not considered in detail. The rationale for the decision not to analyze those issues in detail is discussed in Section 2.3 of the EA. To identify additional issues and alternatives, WS made the EA available to the public for review and comment through notices published in local media and through direct notification of interested parties. WS made the EA available to the public for review and comment by a legal notice published in *The News and Observer* newspaper from November 11, 2015 through

November 13, 2015. WS also made the EA available to the public for review and comment on the APHIS website on October 28, 2015 and on the regulations.gov website beginning on October 23, 2015. WS also sent a notice of availability directly to agencies, organizations, and individuals with probable interest in managing mammal damage in the State. The public involvement process ended on December 11, 2015. During the public comment period, WS received four comments on the draft EA. Appendix A of this decision summarizes the comments received and provides response to the comments. Based on further review of the draft EA, WS incorporated minor editorial changes into the final EA. Those minor changes enhanced the understanding of the EA, but did not change the analysis provided in the EA.

ALTERNATIVES

The EA evaluated three alternatives in detail to respond to the need for action discussed in Chapter 1 and the issues identified in Chapter 2 of the EA. Section 3.1 of the EA provides a description of the alternatives evaluated in detail. A detailed discussion of the effects of the alternatives on the issues occurs in Chapter 4 of the EA. WS also considered additional alternatives, but the EA did not evaluate those alternatives in detail. Section 3.2 of the EA provides the reasons for not evaluating those alternatives in detail. WS would incorporate those standard operating procedures discussed in Section 3.3 and Section 3.4 of the EA into activities if the decision-maker selected the proposed action alternative (Alternative 1) and when applicable, the technical assistance alternative (Alternative 2), if selected. If the decision-maker selected the no involvement by WS alternative (Alternative 3), the lack of assistance by WS would preclude the employment or recommendation of those standard operating procedures addressed in the EA.

ENVIRONMENTAL CONSEQUENCES

Section 4.1 of the EA analyzes the environmental consequences of each alternative as those alternatives relate to the issues by analyzing the environmental consequences of each alternative in comparison to determine the extent of actual or potential impacts on the issues. Section 4.1 of the EA provides information needed to make informed decisions when selecting the appropriate alternative to address the need for action. The proposed action/no action alternative (Alternative 1) served as the baseline for the analysis and the comparison of expected impacts among the alternatives.

The following resource values in North Carolina are not expected to be significantly impacted by any of the alternatives analyzed in the EA: soils, geology, minerals, water quality/quantity, flood plains, wetlands, critical habitats (areas listed in threatened and endangered (T&E) species recovery plans), visual resources, air quality, prime and unique farmlands, aquatic resources, timber, and range. The activities proposed in the alternatives would have a negligible effect on atmospheric conditions including the global climate. Meaningful direct or indirect emissions of greenhouse gases would not occur as a result of any of the alternatives. Those alternatives would meet the requirements of applicable laws, regulations, and Executive Orders, including the Clean Air Act and Executive Order 13514. The discussion below is a summary of the environmental consequences of the alternatives for each of the issues analyzed in detail.

Issue 1 - Effects of Damage Management Activities on Target Mammal Populations

Under the proposed action, WS would incorporate non-lethal and lethal methods described in Appendix B of the EA into an integrated methods approach in which WS' personnel could employ all or a combination of methods to resolve a request for assistance. Non-lethal methods can disperse, exclude, or otherwise make an area unattractive to mammals that are causing damage; thereby, potentially reducing the presence of those animals at the site and potentially the immediate area around the site. Non-lethal

methods generally have minimal impacts on overall populations of animals since those species are unharmed.

A common issue is whether damage management actions would adversely affect the populations of target mammal species when WS' employees employ lethal methods. Lethal methods can remove specific mammals that personnel of WS have identified as causing damage or posing a threat to human safety. The number of mammals removed from a population by WS using lethal methods would be dependent on the number of requests for assistance received. In addition, the number of mammals removed would be dependent on the number of animals involved with the associated damage or threat, the efficacy of methods employed, and the number of individual animals the NCWRC authorizes WS to remove, when required. Based on those quantitative and qualitative parameters addressed in the EA, the anticipated number of mammals that WS' employees could lethally remove annually to address requests for assistance under the proposed action alternative (Alternative 1) would be of low magnitude when compared to population trend data, population estimates, and/or harvest data.

The lack of WS' direct involvement does not preclude the lethal removal of mammals by those persons experiencing damage or seeking assistance from other entities. If the WS program only provided technical assistance under Alternative 2 or provided no assistance under Alternative 3, those people experiencing damage or threats could remove mammals themselves under any of the alternatives when the NCWRC authorizes the removal, when authorization is required. In some cases, a landowner or their designee can lethally remove individual animals of certain species at any time they cause damage without the need to have specific authorization from the NCWRC. In addition, a resource owner could seek assistance from private businesses to remove mammals causing damage or they could remove certain animals during the regulated hunting and/or trapping seasons in the State. Therefore, WS' involvement in the lethal removal of those mammals under the proposed action would not be additive to the number of mammals that could be removed by other entities in the absence of WS' involvement. The number of mammals lethally removed annually would likely be similar across the alternatives, since the removal of mammals could occur even if WS was not directly involved with providing assistance under Alternative 2 and Alternative 3. WS does not have the authority to regulate the number of mammals lethally removed annually by other entities.

Issue 2 - Effects of Activities on the Populations of Non-target Animals, Including T&E Species

WS' personnel have experience with managing animal damage and receive training in the employment of methods. WS' employees would use the WS Decision Model to select the most appropriate methods to address damage caused by targeted animals and to exclude non-target species. To reduce the likelihood of capturing non-target animals, WS would employ selective methods for the target species, would employ the use of attractants that were as specific to target species as possible, and determine placement of methods to avoid exposure to non-targets. Section 3.3 and Section 3.4 in the EA discuss the standard operating procedures that WS' personnel would follow to prevent and reduce any potential adverse effects on non-target animals. Despite the best efforts to minimize non-target exposure to methods during program activities, the potential for WS' personnel to disperse, live-capture, or lethally remove non-target animals exists when applying both non-lethal and lethal methods to manage damage or reduce threats to safety.

The unintentional removal or capture of animals during damage management activities conducted under the proposed action alternative would primarily be associated with the use of body-gripping traps and in some situations, with live-capture methods, such as foothold traps, cage traps, and cable restraints. The non-targets lethally removed unintentionally by WS during previous activities are representative of non-targets that WS' personnel could lethally remove under the proposed action alternative (see Section 4.1 of

the EA). WS could also lethally remove additional species of non-targets unintentionally under the proposed action alternative.

Although WS' employees could lethally remove non-target animals, removal of individuals from any species is not likely to increase substantially above the levels analyzed in the EA. WS would continue to monitor activities, including non-target animal removal, to ensure the annual removal of non-target animals would not result in adverse effects to a species' population. WS' personnel have not captured or adversely affected any threatened or endangered species during previous activities conducted in North Carolina.

The ability of people to reduce damage and threats caused by mammals would be variable under Alternative 2 and Alternative 3, since the skills and abilities of the person implementing damage management actions or the availability of other entities capable of providing assistance could determine the level of success in resolving damage or the threat of damage. If people or other entities apply those methods available as intended, risks to non-targets would be similar to Alternative 1. If people or other entities apply methods available incorrectly or apply those methods without knowledge of animal behavior, risks to non-target animals would be higher under any of the alternatives. If frustration from the lack of available assistance under Alternative 2 and Alternative 3 caused those people experiencing mammal damage to use methods that were not legally available for use, risks to non-targets would be higher under those alternatives. People have resorted to the use of illegal methods to resolve wildlife damage that have resulted in the lethal removal of non-target animals.

WS has determined that the proposed activities "*may affect*" several species listed as threatened or endangered within the State by the United States Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service but those effects would be solely beneficial, insignificant, or discountable. Therefore, those effects would warrant a "*not likely to adversely affect*" determination for those species (see Appendix C in the EA). In addition, WS has made a "*no effect*" determination for several species currently listed as threatened or endangered in the State based on those methods currently available and based on current life history information for those species.

Pursuant to Section 7 of the ESA, WS consulted with the USFWS on those effects analysis and determinations. The USFWS concurred with those effects determination made by WS (J. Hammond, USFWS, pers. comm. 2015, P. Benjamin, USFWS, pers. comm. 2015). In addition, WS has reviewed those species considered threatened or endangered by the NCWRC (see Appendix D of the EA) and determined the proposed action would not adversely affect any of those species listed within the State. The NCWRC has concurred with WS' determination for State listed species (B. Sherrill, NCWRC, pers. comm. 2015).

Issue 3 - Effects of Damage Management Activities on Human Health and Safety

The threats to human safety from methods would be similar across the alternatives since the same methods would be available. However, the expertise of WS' employees in using those methods available likely would reduce threats to human safety since WS' employees would be trained and knowledgeable in the use of those methods. Gonacon™ (available for deer only), immobilizing drugs, euthanasia chemicals, and the use of aircraft would be the only methods that would have limited availability to all entities under the alternatives. Gonacon™, immobilizing drugs, and euthanasia chemicals are methods that personnel would apply directly to target animals; therefore, the availability of those methods to WS would not increase risks to human safety since WS' personnel would receive training in the proper use, storage, and personal safety associated with those methods. Similarly, WS' pilots and crewmembers receive training and have experience to recognize the circumstances that lead to accidents, which would minimize threats to human safety.

If people used methods incorrectly or without regard for human safety, risks to human safety would increase under any of the alternatives that people employed those methods. Although risks do occur from the use of those methods available, when people use those methods in consideration of human safety, the use of those methods would not pose additional risks beyond those associated with the use of other methods. No adverse effects to human safety occurred from the use of methods by WS to alleviate mammal damage in the State from FY 2010 through FY 2014. Based on the use patterns of methods available to address damage caused by mammals and the experience/training that WS' personnel receive, this alternative would comply with Executive Order 12898 and Executive Order 13045.

Issue 4 - Effects of Damage Management Activities on the Aesthetic Value of Mammals

Mammals may provide aesthetic enjoyment to some people in the State, such as through observations, photographing, and knowing they exist as part of the natural environment. Methods available that could be employed under each of the alternatives could result in the dispersal, exclusion, or removal of individuals or small groups of mammals to resolve damage and threats. Therefore, the use of methods often results in the removal of mammals from the area where damage was occurring or the dispersal of mammals from an area. Since methods available would be similar across the alternatives, the use of those methods would have similar potential impacts on the aesthetics of mammals. However, even under the proposed action alternative, the dispersal and/or lethal removal of mammals would not reach a magnitude that would prevent the ability to view those species outside of the area where damage was occurring. The effects on the aesthetic values of mammals would therefore be similar across the alternatives and would be minimal.

Issue 5 - Humaneness and Animal Welfare Concerns of Methods

WS also identified method humaneness and animal welfare as an issue. Since many methods addressed in Appendix B of the EA would be available under all the alternatives, the issue of method humaneness and animal welfare would be similar for those methods across all the alternatives. As stated previously, Gonacon™, immobilizing drugs, euthanasia chemicals, and the use of aircraft would be the only methods that would have limited availability to all entities under the alternatives. The ability of WS to provide direct operational assistance under the proposed action alternative would ensure methods were employed by WS' personnel as humanely as possible. Under the other alternatives, other entities could use methods inhumanely if used inappropriately or without consideration of mammal behavior. However, the skill and knowledge of the person implementing methods to resolve damage would determine the efficacy and humaneness of methods. A lack of understanding of the behavior of mammals or improperly identifying the damage caused by mammals along with inadequate knowledge and skill in using methodologies to resolve the damage or threat could lead to incidents with a greater probability of other people perceiving the action as inhumane under Alternative 2 and Alternative 3. Despite the lack of involvement by WS under Alternative 3 and WS' limited involvement under Alternative 2, those methods perceived as inhumane by certain individuals and groups would still be available for use by other entities to resolve damage and threats caused by mammals.

CUMULATIVE IMPACTS OF THE PROPOSED ACTION

No significant cumulative environmental impacts are expected from any of the three alternatives, including the proposed action/no action alternative (Alternative 1). Under the proposed action/no action alternative (Alternative 1), the lethal removal of mammals by WS would not have significant impacts on statewide populations of those species when known sources of mortality are considered. No risk to public safety is expected when activities are provided under Alternative 1 and Alternative 2 since only trained and experienced personnel would conduct and/or recommend damage management activities. There is a

slight increased risk to public safety when persons who reject assistance and recommendations and conduct their own activities under Alternative 2, and when no assistance is provided under Alternative 3. However, under all of the alternatives, those risks would not be to the point that the impacts would be significant. The analysis in the EA indicates that an integrated methods approach to managing damage and threats caused by mammals would not result in significant cumulative adverse effects on the quality of the human environment.

DECISION AND RATIONALE

I have carefully reviewed the EA prepared to meet the need for action. I find the proposed action/ no action alternative (Alternative 1) to be environmentally acceptable, addressing the issues and needs while balancing the environmental concerns of management agencies, landowners, advocacy groups, and the public. The analyses in the EA adequately address the identified issues, which reasonably confirm that no significant impact, individually or cumulatively, to animal populations or the quality of the human environment are likely to occur from the proposed action, nor does the proposed action constitute a major federal action. Therefore, the analysis in the EA does not warrant the completion of an Environmental Impact Statement.

Based on the analyses in the EA, the issues identified are best addressed by selecting Alternative 1 (proposed action/no action) and applying the associated standard operating procedures discussed in Chapter 3 of the EA. Alternative 1 successfully addresses (1) managing damage using a combination of the most effective methods and does not adversely impact the environment, property, human health and safety, target species, and/or non-target species, including threatened or endangered species; (2) it offers the greatest chance of maximizing effectiveness and benefits to resource owners and managers; (3) it presents the greatest chance of maximizing net benefits while minimizing adverse impacts to public health and safety; and (4) it offers a balanced approach to the issues of humaneness, animal welfare, and aesthetics when all facets of those issues are considered. Further analysis would be triggered if changes occur that broaden the scope of damage management activities in the State, that affect the natural or human environment, or from the issuance of new environmental regulations. Therefore, it is my decision to implement the proposed action/no action alternative (Alternative 1) as described in the EA.

Finding of No Significant Impact

Based on the analyses provided in the EA, there are no indications that the proposed action/no action alternative (Alternative 1) would have a significant impact, individually or cumulatively, on the quality of the human environment. I agree with this conclusion and therefore, find that an Environmental Impact Statement should not be prepared. This determination is based on the following factors:

1. WS' activities to manage damage in the State would not be regional or national in scope.
2. Based on the analyses in the EA, the methods available under the Alternative 1 would not adversely affect human safety based on their use patterns.
3. There are no unique characteristics such as park lands, prime farm lands, wetlands, wild and scenic areas, or ecologically critical areas that would be significantly affected. WS' standard operating procedures and adherence to applicable laws and regulations would further ensure that WS' activities do not harm the environment.
4. The effects on the quality of the human environment are not highly controversial. Although there is some opposition to managing damage and the methods, this action is not highly controversial in terms of size, nature, or effect.

5. Based on the analysis documented in the EA and the accompanying administrative file, the effects of the proposed damage management program on the human environment would not be significant. The effects of the proposed activities are not highly uncertain and do not involve unique or unknown risks.
6. Alternative 1 would not establish a precedent for any future action with significant effects.
7. No significant cumulative effects were identified through the assessment. The EA analyzed cumulative effects and concluded that such impacts were not significant for this or other anticipated actions to be implemented or planned within the State of North Carolina.
8. The proposed activities under Alternative 1 would not affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places, nor would they likely cause any loss or destruction of significant scientific, cultural, or historical resources.
9. WS has determined that the proposed program under Alternative 1 would have no effect on some threatened or endangered species and would not adversely affect the other federally listed T&E species currently listed in the State and the USFWS has concurred with WS' determination. In addition, WS has determined that the proposed activities would not adversely affect State-listed species.
10. The proposed activities under Alternative 1 would comply with all applicable federal, state, and local laws.

The rationale for this decision is based on several considerations. This decision takes into account public comments, social/political and economic concerns, public health and safety, and the best available science. The foremost considerations are that: 1) damage management would only be conducted by WS at the request of landowners/managers, 2) management actions would be consistent with applicable laws, regulations, policies and orders, and 3) no adverse effects to the environment were identified in the analysis. As a part of this Decision, the WS program in North Carolina would continue to provide effective and practical technical assistance and direct management techniques that reduces damage and threats of damage.



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Date

1/21/16

LITERATURE CITED

- USDA. 2005. Environmental Assessment – White-tailed deer damage management in North Carolina. United States Department of Agriculture, Animal and Plant Health Inspection Service, Wildlife Services, Raleigh, North Carolina. 75 pp.
- USDA. 2012. Environmental Assessment – Reducing mammal damage in the State of North Carolina. United States Department of Agriculture, Animal and Plant Health Inspection Service, Wildlife Services, Raleigh, North Carolina. 139 pp.

APPENDIX A

RESPONSES TO COMMENTS ON THE ENVIRONMENTAL ASSESSMENT: REDUCING MAMMAL DAMAGE IN THE STATE OF NORTH CAROLINA

During the public involvement process for the draft EA, WS received four comments. WS has reviewed the comments to identify additional issues, alternatives, and/or concerns that were not addressed in the EA. The comments received during the public involvement process are summarized below along with responses to the comments.

I. COMMENTS ON THE NEED FOR ACTION

Comment – No one in North Carolina wants WS to provide assistance. Animals do not bother anyone.

Response: People have requested assistance from WS previously and continue to request assistance from WS. WS only provides assistance after receiving a request for such assistance. Therefore, the need for action to manage damage and threats associated with mammals in North Carolina arises from requests for assistance received by WS (see Section 1.2 of the EA). WS receives requests to reduce or prevent damage from occurring to agricultural resources, natural resources, property, and threats to human safety. WS has identified those mammal species most likely to be responsible for causing damage in the State based on previous requests for assistance.

II. COMMENTS ON PUBLIC INVOLVEMENT

Comment – There is no public notice in North Carolina. WS should notify specific entities. Comments are ignored.

Response: WS made the EA available to the public for review and comment by a legal notice published in *The News and Observer* newspaper. WS also made the EA available to the public for review and comment on the APHIS website and on the regulations.gov website. WS also sent a notice of availability directly to agencies, organizations, and individuals with probable interest in managing mammal damage in the State. WS encourages people to sign-up for notifications through the APHIS Stakeholder Registry. People can access the registry by going to the APHIS website and clicking on the APHIS Stakeholder Registry link on the home page. People can access the APHIS home page and the registry by visiting the website at <https://www.aphis.usda.gov/wps/portal/aphis/home/>. WS fully considers new issues, concerns, or alternatives the public identifies during the public involvement period.

III. COMMENTS RELATING TO AN ISSUE

Comment – Animals have a right to be alive on earth and in North Carolina.

Response: WS understands the philosophy that some people have that society should extend the rights of people to animals. As stated throughout the EA, WS would only provide assistance after receiving a request for such assistance and would only employ those methods that the requesters agree with. Therefore, those people requesting assistance from WS may prefer and request that WS use lethal methods to remove those animals causing damage or posing a threat of damage. In addition, the standard WS Decision Model (Slate et al. 1992; see WS Directive 2.201) would be the site-specific procedure for individual actions that WS could conduct in the State (see Chapter 3 of the EA for a description of the Decision Model and its application). Decisions made using the model would be in accordance with SOPs described in the EA and WS' directives, as well as relevant laws and regulations. Using the Decision

Model and based on site visits or reported information, WS would consider several factors before selecting or recommending methods and techniques. However, WS would give preference to non-lethal methods when formulating a management strategy using the WS Decision Model pursuant to WS Directive 2.101. When the person requesting assistance determined the death of animal was necessary, the goal of WS would be to use methods in the most humane way possible that minimizes the stress and pain to the animal.

IV. COMMENTS RELATING TO AN ALTERNATIVE

Comment – Commenter supports continuing the current program. Support for the proposed action/no action alternative (Alternative 1). It is important to have the widest range of methods available to manage damage.

Response: The WS program appreciates the comment. WS developed alternatives to meet the need for action, which the EA describes in Chapter 1, and to address the identified issues associated with managing damage caused those mammal species addressed in the EA, which were described in Chapter 2 of the EA. The EA analyzed continuing the current program using an integrated methods approach to managing mammal damage (Alternative 1; see Section 3.1 of the EA). Section 4.1 of the EA analyzes the environmental consequences of each of the alternatives in comparison to determine the extent of actual or potential impacts on the issues, including continuing the current program. Based on the analyses of the alternatives that were developed to address those issues analyzed in detail within the EA, including individual and cumulative impacts of those alternatives, the WS program will issue a decision for the final EA.

Comment – Commenter opposes any involvement by WS. Support for the no involvement by WS alternative (Alternative 3).

Response: The WS program appreciates the comment. WS developed alternatives to meet the need for action, which the EA describes in Chapter 1, and to address the identified issues associated with managing damage caused those mammal species addressed in the EA, which were described in Chapter 2 of the EA. The EA analyzed a no involvement by the WS program alternative (Alternative 3; see Section 3.1 of the EA). Under Alternative 3, the WS program would not be involved with any aspect of managing mammal damage in the State. Section 4.1 of the EA analyzes the environmental consequences of each of the alternatives in comparison to determine the extent of actual or potential impacts on the issues, including the no involvement by WS alternative. Based on the analyses of the alternatives that were developed to address those issues analyzed in detail within the EA, including individual and cumulative impacts of those alternatives, the WS program will issue a decision for the final EA.

Comment – WS only uses lethal methods and wants to kill all wildlife

Response: The WS Decision Model would be the implementing mechanism for a damage management program under applicable alternatives that could be adapted to an individual damage situation. When WS receives a request for direct operational assistance, WS would conduct site visits to assess the damage or threats, would identify the cause of the damage, and would apply the Decision Model described by Slate et al. (1992) and WS Directive 2.201 to determine the appropriate methods to resolve or prevent damage. Discussion of the Decision Model and WS' use of the Model occurs in Section 3.1 of the EA. In addition, WS would give preference to non-lethal methods when practical and effective (see WS Directive 2.101). Appendix B in the EA discusses many non-lethal methods that WS' personnel could recommend or employ to resolve damage under the applicable alternatives. The WS program does not attempt to eradicate any species of native wildlife in the State. WS operates in accordance with federal and state laws and regulations enacted to ensure species viability.

V. COMMENTS ON FUNDING

Comment – Funding for the WS program should be cut to zero.

Response: Damage management activities are an appropriate sphere of activity for government programs, since managing wildlife is a government responsibility. Eliminating the WS program would be similar to the alternative analyzed in detail in the EA where there would be no involvement by the WS program with any aspect of managing mammal damage in North Carolina (Alternative 3). Therefore, adding an analysis of an additional alternative whereby WS or another entity pursued the termination of the funding for WS would not add to the existing analyses in the EA. Under Alternative 3, the WS program would not be involved with any aspect of managing mammal damage; however, other entities could conduct damage management activities in the absence of the WS program.